

QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

HADDON HEATING AND COOLING, on
behalf of itself and all others similarly situated,

Plaintiffs,

vs.

OUTOKUMPU OYJ; OUTOKUMPU
COPPER PRODUCTS OY; OUTOKUMPU
COPPER (U.S.A.), INC.; OUTOKUMPU
COPPER FRANKLIN, INC.; OUTOKUMPU
HEATCRAFT U.S.A., LLC; MUELLER
INDUSTRIES, INC.; MUELLER EUROPE,
LTD.; WIELAND WERKE AG; KM
EUROPA METAL AG; TREFIMETAUX
SA; EUROPA METALLI SpA.; and DOES 1-
100,

Defendants.

CASE NO. C-06-4126

STIPULATION EXTENDING TIME TO
RESPOND TO PLAINTIFFS' COMPLAINT
AND ORDER

Assigned to: Hon. Martin J. Jenkins

Trial Date: none set

WHEREAS, Mueller Industries, Inc. is a defendant in the above-captioned matter; and

1 WHEREAS, Outokumpu Oyj; Outokumpu Copper Products Oy; Outokumpu Copper
2 (U.S.A.), Inc.; Outokumpu Copper Franklin, Inc.; and Outokumpu Heatcraft U.S.A., LLC
3 (collectively, "Outokumpu") are defendants in the above-captioned matter; and

4 WHEREAS, the first Case Management Conference in this matter is presently scheduled
5 for October 3, 2006; and

6 WHEREAS, plaintiffs are considering consolidation of this action with related actions
7 currently pending in other jurisdictions; and

8 WHEREAS plaintiffs and defendants Mueller Industries, Inc. and Outokumpu seek to
9 avoid unnecessarily expending the resources of the parties and the Court;

10 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between
11 counsel for plaintiffs and counsel for Mueller Industries, Inc. and Outokumpu that Mueller
12 Industries, Inc. and Outokumpu shall have until September 27, 2006, to serve an answer or other
13 response to the Complaint.

14 IT IS HEREBY FURTHER STIPULATED AND AGREED that this Stipulation is not an
15 appearance and will not in any way be considered an acceptance of jurisdiction or waiver of
16 service and that Mueller Industries, Inc. and Outokumpu reserve all of their rights to contest or
17 object to personal jurisdiction in this matter and reserve all other defenses under Rule 12 of the
18 Federal Rules of Civil Procedure.

19 DATED: July 28, 2006

20 QUINN EMANUEL URQUHART OLIVER &
21 HEDGES, LLP

22 By 

23 Loren Kieve
24 Thomas E. Wallerstein
25 Attorneys for Mueller Industries, Inc.

1 DATED: July 28, 2006

WILMER CUTLER PICKERING HALE AND DORR
LLP

2
3 By Elizabeth Rogers / TEW with permission
4 Elizabeth I. Rogers
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12 Attorneys for Outokumpu Oy; Outokumpu Copper
13 Products Oyj; Outokumpu Copper (U.S.A.), Inc.;
14 Outokumpu Copper Franklin, Inc.; and Outokumpu
15 Heatcraft U.S.A., LLC

16 DATED: July 28, 2006

TRUMP, ALIOTO, TRUMP & PRESCOTT

17 By Mario Alioto / TEW with permission
18 Mario N. Alioto
19 Lauren C. Russell
20 Attorneys for plaintiff Haddon Heating and
21 Cooling

22 8/3/2006



PROOF OF SERVICE

I, Cheryl Morones, declare under penalty of perjury under the laws of The State of California that the following is true and correct:

I am employed in the City of Redwood Shores, County of San Mateo, State of California, in the office of a member of the bar of this court, at whose direction the service was made. I am a citizen of the United States, over the age of eighteen (18) years, and not a party to or interested in the within-entitled action. My business address is at the law firm QUINN EMANUEL URQUHART OLIVER & HEDGES, LLP, 555 Twin Dolphin Drive, Suite 560, Redwood Shores, California 94065.

I caused to be served the following document(s):

STIPULATION EXTENDING TIME TO RESPOND TO PLAINTIFFS' COMPLAINT

I caused the above document(s) to be served on each person on the attached list by the following means:

[M] I enclosed true and correct copies of said document(s) in an envelope and placed it for collection and mailing with the United States Post Office on July 28, 2006, following the ordinary business practice.

(Indicated on the attached address list by an [M] next to the address.)

I am readily familiar with my firm's practice for collection and processing of correspondence for delivery in the manner indicated above, to wit, that correspondence will be deposited for collection in the above-described manner this same day in the ordinary course of business.

Executed on July 28, 2006, at Redwood Shores, California.


CHERYL MORONES

SERVICE LIST

Key:	[M] Delivery by Mail	[FD] Delivery by Federal Express	[H] Delivery by hand
	[F] Delivery by Facsimile	[FM] Delivery by Facsimile and Mail	
[M]	Mario N. Alioto Lauren C. Russell TRUMP, ALIOTO, TRUMP & PRESCOTT, LLP 2280 Union Street San Francisco, CA 94123	Attorneys for plaintiff Haddon Heating and Cooling	
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[M]	Eric J. Mahr Michelle D. Miller 1875 Pennsylvania Avenue, NW Washington, D.C. 20006	Attorneys for Outokumpu Oy; Outokumpu Copper Products Oyj; Outokumpu Copper (U.S.A.), Inc.; Outokumpu Copper Franklin, Inc.; and Outokumpu Heatcraft U.S.A., LLC	